

REMARKS

**Status of Claims:**

Claims 1-32 are present for examination.

**Prior Art Rejection:**

Claims 1-12 and 17-28 stand rejected under 35 U.S.C. § 103 as unpatentable over Tso (6,185,625) in view of Szymansky (6,557,029). Claims 13-16 and 29-32 stand rejected under 35 USC 103 as unpatentable over Tso in view of Szymansky and further in view of Maslov.

The examiner's rejections are respectfully traversed.

The primary Tso reference utilizes a remote scaling server 1 which is interposed between the network client 3 and the internet network 2. The remote scaling server 1 comprises an HTTP remote proxy 6 and encode manager 7, encode service providers 8, a cache interface 9 and a cache memory 10. The remote scaling server may be implemented as a network server, a stand-alone computer in communication with the network server, or a distributed system of computers (Column 6, lines 5-8). The HTTP remote proxy 6 not only examines requests to and replies from external internet resources, but also acts on commands in these requests by, for example, determining whether or not to scale content. The HTTP remote proxy 6 is also capable of changing content received from the internet 2 prior to returning it to the requesting network client 3 by, for example, scaling the content (column 6, lines 19-26).

In contrast to the Tso teaching, applicant transmits/receives a multimedia content from an object having character data, image data or voice data through a network which includes a radio data communication network. In accordance with claim 1, the method is performed in the portable radio communication terminal and includes the steps of storing a plurality of objects, generating an expression style format for expressing the stored objects and storing the generated expression style format. Applicant's independent apparatus claim 17 specifically recites that the portable radio communication terminal (itself) comprises a first memory means for storing a

plurality of objects, expression style format generation means for generating an expression style format for expressing the object stored in the first memory means; and second memory means for storing the expression style format generation means.

The prior art simply does not disclose applicant's invention since the Tso reference does not provide any generation of expression style format nor storing of the generated expression style format within the network client, but rather relies on the remote scaling server to satisfy the user-specified encoding preferences wherein the remote scaling server 1 is interposed between the network client 3 and the internet 2. The deficiencies of Tso are not found in Szymansky.

As discussed in applicant's previously filed amendment, the disclosure of Szymansky is quite brief in relation to the handheld computer 100. Certainly, the handheld computer 100 transmits information in a wireless fashion to the wireless antenna 102 which is on the exchange floor which is subsequently transmitted through the exchange network 106 and exchange firewall 108 to an outside firm and to a "marketlook" information system server of the outside firm. The "marketlook" server 112 is shown in further detail in Szymansky's figure 2 and is seen to comprise an HTTP web server 208 which permits access to web clients 210-214. Through an EAN interface 204, the information input into the computer 100 may be fed to the marketlook server and through the HTTP server 208 to the various web clients.

In relation to performing any other recited limitations in claim 1 in the radio communication terminal (corresponding to the mobile hand-held computer 100) the Szymansky specification lacks any substantial detail. Certainly, input data such as appears after line 2 in column 3 may be input by a user utilizing a touch sensitive screen and a stylus. As stated in column 3, line 21, the information entered on the screen is converted by the central processing unit of the hand-held computer 100. However, the type of conversion is not stated. It would appear, however, that the screen input is converted to pixel data files which are then made available to be viewed by the web clients through the "marketlook" server as shown, for example, in figure 3.

Figure 3 of Szymansky is a screenshot of the web browser which displays the handwritten jottings of the person utilizing the hand-held computer 100. See column 4, lines 23-25 of Szymansky. Notably absent is any teaching within Szymansky of generating an expression style format for expressing the stored objects as specifically recited in applicant's claim 1. Likewise, according to applicant's independent claim 17, Szymansky does not disclose any expression style format generating means for generating an expression style format for expressing the objects stored in the first memory means.

According to the recitations of claim 1, the radio communication terminal performs at least three steps, namely, (1) storing a plurality of objects; (2) generating an expression style format for expressing the stored objects; and (3) storing the generated expression style format. While Szymansky may teach by implication the storing of a plurality of objects bases on the strokes input by the user utilizing the stylus, Szymansky goes into no further details. While one may imagine that Szymansky has some means to store the plurality of objects which are presented on the screen, Szymansky does not inherently have limitations (2) and (3) nor does Szymansky expressly disclose such limitations. Indeed, if Szymansky performed the limitations (2) and (3) as set forth above, it is likely that the "marketlook" information system server 112 would perform such functions since this server contains both an interface to the hand-held computers 100, a marketlook manager 206 and a database 202 in which the graphic files representing the handwritten jottings and other information are stored. See column 4, lines 15-18. However, Szymansky simply is silent as to any teaching of limitations (2) and (3).

The examiner has apparently recognized the deficiencies of Szymansky and has clarified that Szymansky is merely being cited to show that the hand held computer is capable of converting information entered or spoken into the wireless terminal for transmission to the network.

**Lack of Motivation:**

Applicant can find no motivation to combine the teachings of Tso and Szymansky in a manner to meet applicant's claims. Given the teachings of Tso, even combined with the teachings of Szymansky, it is not seen how one would be motivated to take the remote scaling server functions in the remote scaling server of Tso and move them into the mobile terminal of Szymansky. Indeed, it would appear that the memory size and processing power utilized by the server would not permit nor motivate one to move the processing functions taught by Tso into the wireless hand-held computer of Szymansky. Even accepting, for the sake of argument, that Szymansky teaches a computer capable of converting information entered or spoken into the wireless terminal for transmission to the network (as stated by the examiner), such a teaching has nothing to do with having the remote terminal generate expression style formats. Indeed, the straight forward way to combine Tso with Szymansky, without the use of applicant's own specification as a guide, is to form a system in which the browser or network client 3 of Tso is replaced with the mobile client 118 of Szymansky so that in the resulting system (1) the mobile client still performs the functions of converting information entered or spoken into the wireless terminal for transmission to the network and (2) the remote scaling server 1 of Tso still performs its disclosed function of scaling in response to request by the mobile client. The above described resulting system does NOT, of course, make obvious applicant's invention as the scaling is performed in the remote scaling server and not in the mobile client. As such it is submitted that the Patent and Trademark Office has not made out a *prima facie* case of obviousness under the provisions of 35 USC 103. As such, the Sec. 103 rejection must be withdrawn.

The Maslov patent applied to dependent claims 13-16 and 29-32 does not cure the defects of the teachings of the primary Tso and secondary Szymansky references. As such, it is submitted that all of applicant's claims are patentable over the prior art.

**Acknowledgment of Previously Filed IDS:**

The examiner is **AGAIN** requested to acknowledge receipt of the certified copy of applicant's priority document filed together with the application on **December 15, 2000**.

**Conclusions:**

In view of the arguments set forth above, it is submitted that the Patent and Trademark Office has not made out a *prima facie* case of obviousness under the provisions of 35 U.S.C. § 103.

It is submitted that the application is now in condition for allowance and an early indication of same is earnestly solicited.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741.

If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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